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BLACK & VEATCH CONSTRUCTION, INC.
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10 UNITED STATES BANKRUPTCY COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION
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14 In Re:
15 PG&E CORPORATION,
16 - and -
17 PACIFIC GAS AND ELECTRIC
COMPANY,
18 Debtors.
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Bankruptcy Case
Case No.: 19-30088-DM (Lead Case)
Chapter 11

(Jointly Administered)

**DECLARATION OF JONATHAN A.
SHAPIRO IN SUPPORT OF BLACK
& VEATCH CONSTRUCTION,
INC.'S MOTION TO QUASH THE
OFFICIAL COMMITTEE OF TORT
CLAIMANTS' SUBPOENA
PURSUANT TO FED. R. CIV. P.
45(d)(3)**

Hearing
Date: March 10, 2020
Time: 10:00 a.m. (Pacific Time)
Place: Courtroom 17
450 Golden Gate Ave., 16th Fl.
San Francisco, CA 94102

1 I, Jonathan Shapiro, declare as follows:

2 1. I am an attorney duly licensed to practice in the State of California and before the
3 United States District Court for the Northern District of California. I am a Partner in the law firm of
4 Baker Botts L.L.P., counsel for non-party Black & Veatch Construction, Inc. ("**BVCI**"). I submit this
5 Declaration in Support of BVCI's Motion to Quash the Official Committee of Tort Claimants' (the
6 "**TCC**") Subpoena Pursuant to Federal Rule of Civil Procedure 45(d)(3). I have personal knowledge
7 of the matters set forth below.

8 2. Attached hereto as **Exhibit A** is a true and correct copy of the TCC's Subpoena to
9 BVCI to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a
10 Bankruptcy Case (or Adversary Proceeding), dated January 15, 2020 (the "**Subpoena**").

11 3. Attached hereto as **Exhibit B** is a true and correct copy of BVCI's Objections to the
12 Subpoena Pursuant to Federal Rule of Civil Procedure 45(d)(2)(B), dated February 14, 2020.

13 4. By agreement of counsel, BVCI's deadline within which to respond and object to the
14 Subpoena was extended to February 14, 2020.

15 I declare under penalty of perjury that the foregoing is true and correct.

16 Executed this 25th day of February 2020, at San Francisco, California.

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18 By: /s/ Jonathan A. Shapiro
Jonathan A. Shapiro
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